

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HANS A. QUAAK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

**PLAINTIFFS' MOTION FOR RECONSIDERATION OF THE PORTION OF THE
JULY 10, 2006 ORDER DENYING PLAINTIFFS' MOTION TO COMPEL DEXIA
BANK BELGIUM TO PRODUCE PIET CORDONNIER FOR DEPOSITION**

Pursuant to Local Rule 7.1, Plaintiffs in the above-captioned actions seek reconsideration of a limited portion of the Memorandum And Order On Plaintiffs' Joint Motion To Compel Depositions Of Dexia Bank Belgium issued by Magistrate Judge Collings on July 10, 2006 (the "Order", attached hereto as **Exhibit A**). Plaintiffs' solely seek reconsideration of that portion of the Order which denies Plaintiffs' request to take the deposition testimony of Piet Cordonnier.

As demonstrated in the accompanying Memorandum and Declaration, through documents translated and depositions taken since the filing of Plaintiffs' motion, Plaintiffs have developed additional facts which, Plaintiffs respectfully submit, will satisfy this Court's reservations about compelling Mr. Cordonnier's testimony via a Rule 30 notice as a managing agent of Dexia Bank Belgium.

In support of this motion, Plaintiffs file the accompanying Memorandum Of Law and Declaration of Allison K. Jones.

WHEREFORE, Plaintiffs respectfully request that this Court reconsider it July 10, 2006 Order and compel the deposition testimony of Mr. Cordonnier.

RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), Plaintiffs' counsel certifies that on July 24, 2006, they conferred in good faith with opposing counsel regarding Plaintiffs' motion for reconsideration. The conference did not eliminate the need for this motion, nor did it narrow the issues raised.

Dated: July 24, 2006

Respectfully submitted,

**BERMAN DEVALERIO PEASE
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